

EXHIBIT AQ

CHAITMAN LLP

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Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF SEYMOUR EPSTEIN, MURIEL
EPSTEIN, as Executrix of the Estate of Seymour
Epstein, and as trustee of Trusts created by the Last
Will and Testament of Seymour Epstein, HERBERT
C. KANTOR, as trustee of Trusts created by the Last
Will and Testament of Seymour Epstein, and
SHELBURNE SHIRT COMPANY, INC.,

Defendants.

Adv. Pro. No. 10-04438 (SMB)

DECLARATION OF JEFFREY J. CRONIN, CPA, CFE, CFF

1. I am a Certified Public Accountant and Partner with the firm Buchbinder Tunick & Company LLP. My Office address is One Pennsylvania Plaza, Suite 3500, New York, NY 10119.

2. The focus of my practice is the preparation of federal and state tax returns for individuals, trusts, partnerships, LLC's, estates and small businesses.

3. Since on or before 1993 through the present date, I have performed tax preparation services for the Shelburne Shirt Company, Inc.

4. My tax services have included the preparation of tax returns for Seymour Epstein.

5. In order to prepare Exhibit A, I, or a member of my firm, utilized the annual Madoff Portfolio Management Report (PMR) statements of income to determine, to the best of our knowledge, the total income received and the total taxes paid.

6. For years subsequent to 2002, the income shown on Exhibit A includes the Madoff income reported to Seymour Epstein and Shelburne Shirt Company, Inc. The income reported to Seymour Epstein and Shelburne Shirt Company, Inc., as shown, was reported on the tax returns filed with the Internal Revenue Service and the State of New York and the representative allocation income was reported to each member/partner in accordance with their ownership interest in Shelburne Shirt Company, Inc..

7. Throughout the years reflected on Exhibit A, my firm applied that year's maximum statutory income tax rates for both Federal and New York State calculations, which was a reasonable assumption based on our knowledge of Seymour Epstein and Shelburne Shirt Company, Inc.'s filed tax returns. Accordingly, to the best of my knowledge, this information is accurate and complete.

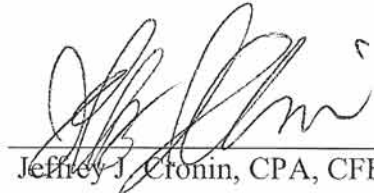
8. Exhibit A attached hereto shows that Seymour Epstein and the partners and/or

members of Shelburne Shirt Company, Inc. income resulting from their investment in Bernard L. Madoff Investment Securities totaled approximately \$1,952,043 and would have paid \$870,483 in total federal and state income taxes on reported gains, interest and dividend income from their Madoff investment account for years 1993 through 2002.

9. I am aware that the IRS issued a ruling in 2009 allowing investors in Bernard L. Madoff Investment Securities to file for a refund for the years 2003 and later. Seymour Epstein and Shelburne Shirt Company, Inc. did file for refunds based on this ruling, and therefore the taxes paid for the period 2003 and later are not included on Exhibit A.

10. Exhibit A incorporates the varying tax rates, tax brackets, and taxable income from Bernard L. Madoff Investment Securities. The impact of the alternative minimum tax has not been included, but doing so would not significantly change the analysis. Exhibit A also excludes the impact any adjustment in reported income in one year might make with respect to carryover gains, losses, and itemized deductions in subsequent years.

December 27, 2017



Jeffrey J. Cronin, CPA, CFE, CFF

EXHIBIT A

Epstein, S. and Shelburn Shirt, et al
Adv. Case Number 10-04438
Schedule of Taxes Paid on Madoff Investment
1993-2008

Year	S. Epstein Madoff Account 1CM049	Federal Taxes	State Taxes	Total Combined Taxes		Shelburne Shirt Madoff Account 1CM005	Federal Taxes	State Taxes		Total Combined Taxes		Total Combined Accounts		Total Combined Federal and State Taxes
1993	57,399	22,730	3,932	26,662		15,689	2,353	1,075		3,428		73,088		30,090
1994	56,436	22,349	3,866	26,215		38,817	5,823	2,659		8,482		95,253		34,697
1995	72,530	28,722	4,968	33,690		63,207	15,802	4,330		20,132		135,737		53,822
1996	89,502	35,443	6,131	41,574		75,033	25,511	5,140		30,651		164,535		72,225
1997	111,541	44,170	7,641	51,811		96,803	32,913	6,631		39,544		208,344		91,355
1998	114,218	45,230	7,824	53,054		114,077	44,490	7,814		52,304		228,295		105,358
1999	142,551	56,450	9,765	66,215		142,430	55,548	9,756		65,304		284,981		131,519
2000	112,292	44,468	7,692	52,160		117,295	45,745	8,035		53,780		229,587		105,940
2001	113,104	44,789	7,748	52,537		137,905	53,783	9,446		63,229		251,009		115,766
2002	129,033	51,097	8,839	59,936		152,181	59,351	10,424		69,775		281,214		129,711
Total	998606	395,448	68,406	463,854		953437	341,319	65,310		406,629		1,952,043		870,483